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March 1, 2018

Via ECF

AUSA Catherine Mirabile
United States Attorney's Office
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Mangano
Ind: 16-CR-540

Dear Ms. Mirabile:

As you are aware I am attorney for Mr. Mangano. Several days ago I made demand for the production of a consensual recording made by Fred Mei in conversation with Harendra Singh dated March 26, 2015. As you know, previously the defendant's made demand for all consensual recordings made by Mr. Mei in this case. The production provided by the Government in response to this demand did not include the recording of March 26, 2015. My demand for the March 26 recording resulted from pouring through the many thousands of documents of discovery in this case and discovering a reference to the recording of March 26, 2015.

By this letter, the defendants reiterate our earlier demand for the production of all consensual recordings made by Frederick Mei in furtherance of his cooperative effort with the Government. Moreover, we make demand for the production of all FBI 302 forms related to each of these recordings, which customarily would include interviews conducted of Mr. Mei upon the conclusion of having met with the individual he had consensually recorded.

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Additionally, the defendants reiterate our earlier demand for the production of the entirety of the recordings retrieved during the 30-day wire tap on Mr. Singh's phone.

Very truly yours,


KEVIN J. KEATING

KJK/lo

Cc: Lara Gatz
Raymond Tierney
Marc Agnifilo
Joshua Kirschner
Matthew Brissenden
John Carman